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Attorneys for Defendant
JI SUNG SHIN a.k.a. JAMES SHIN

FILED
DISTRICT COURT OF GUAM

MAR 22 2006

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT OF GUAM
FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA.

Plaintiff,

vs.

JI SUNG SHIN a.k.a. JAMES SHIN

Defendant.

CRIMINAL CASE NO. 01-00083

MOTION TO WITHDRAW
AS COUNSEL OF RECORD;
and DECLARATION OF
WILLIAM L. GAVRAS, ESQ.

MOTION

COMES NOW, William L. Gavras, Esq., counsel for Defendant JI SUNG SHIN
a.k.a. JAMES SHIN, and moves this court for permission to withdraw as counsel of
record as follows:

MEMORANDUM

FACTS

On February 15, 2006, the undersigned counsel was appointed to represent the
defendant in this matter. Review of the discovery presented in this matter reveals
defense counsel previously represented a member involved in the conspiracy in this

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criminal matter. As such, there may be a conflict of interest and current counsel may no longer be able to effectively represent this Defendant.

This motion will be based on these moving papers, the court file, and any evidence to be presented at the time of the hearing.

CONCLUSION

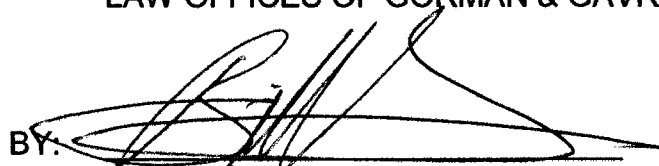
Based on all of the foregoing, William L. Gavras, Esq., respectfully requests this Honorable Court to permit him to withdraw as court appointed counsel for Defendant JI SUNG SHIN a.k.a. JAMES SHIN, and appoint alternative counsel to represent this Defendant in the above-captioned matter.

Respectfully Submitted,

LAW OFFICES OF GORMAN & GAVRAS

Dated: March 22, 2006.

BY:



WILLIAM L. GAVRAS, ESQ.

Attorneys for Defendant

JI SUNG SHIN a.k.a. JAMES SHIN

DECLARATION OF WILLIAM L. GAVRAS, ESQ.

I, WILLIAM L. GAVRAS, declare as follows:

1. I am over 18 years of age and am duly licensed counsel for the Defendant in the above-entitled action and I have personal knowledge of all facts set forth herein.
2. The basis of my knowledge includes my experience with the events described below.

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3. I would testify competently to these facts if called upon by the court.

4. I have previously represented a member involved in the conspiracy of this criminal matter.

5. Based on the foregoing, I respectfully request to be permitted to withdraw as counsel of record for the Defendant.

6. A copy of this Motion will be served upon the Plaintiffs.

I declare under the penalty of perjury, under the laws of Guam that the foregoing is true and correct.

Dated: March 22, 2006.

By:


WILLIAM L. GAVRAS, ESQ.

CERTIFICATE OF SERVICE

I certify that I will cause to be served upon the Office of the United States Attorney and the Defendant, a true and correct copy of this document on or before March 23, 2006.

LAW OFFICES OF GORMAN & GAVRAS

Dated: March 22, 2006.

BY:


WILLIAM L. GAVRAS, ESQ.

Attorneys for Defendant

JI SUNG SHIN a.k.a. JAMES SHIN